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7 Attorney for Peter Anthony Harridge

8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA  
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 PETER ANTHONY HARRIDGE,

15 Defendant.  
16

Case No. 2:16-mj-543-GWF

**UNOPPOSED MOTION TO**  
**MODIFY CONDITIONS OF**  
**PRETRIAL RELEASE**

17 COMES NOW the defendant, Peter Anthony Harridge, by and through his counsel of  
18 record, Monique Kirtley, Assistant Federal Public Defender, and hereby moves this court for  
19 an order to modify his conditions of pretrial release. This motion is supported by the following  
20 Memorandum of Points and Authorities.

21 DATED this 22<sup>nd</sup> day of September, 2016.

22 RENE L. VALLADARES  
23 Federal Public Defender

24 By: /s/Monique Kirtley

25 MONIQUE KIRTLEY  
Assistant Federal Public Defender  
26 Attorney for Peter Anthony Harridge

**MEMORANDUM OF POINTS AND AUTHORITIES**

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2 1. On September 9, 2016, Mr. Harridge was released on bond under Pretrial  
3 Services supervision with conditions. PR Bond (CR#4). Among those conditions,  
4 Mr. Harridge was ordered to surrender any passport(s) to U.S. Pretrial Services. *Id.*  
5 Mr. Harridge surrendered his British passport.

6 2. An additional condition of Mr. Harridge's release and supervision requires that  
7 he clear his traffic infraction bench warrants in Las Vegas Justice Court. On September 12,  
8 2016, Mr. Harridge's counsel appeared before Las Vegas Justice Court Traffic Referee  
9 David Doto, which cleared the bench warrants. Judge Doto has required Mr. Harridge to obtain  
10 his driver's license within 30 days and pay a fine within 90 days to resolve these matters (Justice  
11 Court case numbers LVM0031231, 105297966, and 105259443).

12 3. Mr. Harridge contacted the Nevada Department of Motor Vehicles (DMV) and  
13 was advised that he must show "proof of identity" to obtain a valid Nevada driver's license.  
14 Counsel has confirmed through the Nevada DMV website that there are four ways for  
15 Mr. Harridge to prove his identity: (1) a state issued birth certificate, (2) a passport, (3) a  
16 Consular Report of Birth Abroad, or (4) an out-of-state driver's license, permit, or identification  
17 that contains real ID markings approved by the Department of Homeland Security.<sup>1</sup>  
18 Mr. Harridge's only form of identification was his British passport, which he surrendered to  
19 Pretrial services on September 12, 2016. Furthermore, counsel researched the requirements to  
20 obtain Mr. Harridge's birth certificate from Glendale, California and learned from their website  
21 that a birth certificate request takes 20 working days to receive, which will violate the 30 day  
22 window mandated by the court.<sup>2</sup>  
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<sup>1</sup> <http://dmvnev.com/dlresidency.htm>

26 <sup>2</sup> <http://www.lavote.net/home/records/birth-records/birth-records-request/mail-request>

1           4.       Mr. Harridge, by and through his counsel, requests that the court allow  
2 Mr. Harridge one day (24 hours) to receive his British passport from Pretrial Services and take  
3 it to the Nevada DMV so that he may obtain a Nevada driver's license and comply with the  
4 Clark County Justice Court's requirement that he obtain a license within 30 days. Mr. Harridge  
5 will return his British passport to pretrial services within twenty-four hours of receiving it from  
6 pretrial services

7           5.       Neither Pretrial Services Officer Barlow nor the government have any  
8 opposition to this modification request.

9           DATED this 22<sup>nd</sup> day of September, 2016.

10                               Respectfully Submitted,

11                               RENE L. VALLADARES  
12                               Federal Public Defender

13                               By: /s/ Monique Kirtley  
14                               MONIQUE KIRTLEY  
15                               Assistant Federal Public Defender  
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1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 PETER ANTHONY HARRIDGE,

6 Defendant.

Case No. 2:16-mj-543-GWF

**PROPOSED ORDER**

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9  
10 IT IS HEREBY ORDERED that Pretrial services shall return Defendant Peter  
11 Harridge's British passport for one 24 hour period, so that he may obtain a valid Nevada driver's  
12 license. Defendant Peter Harridge shall return this passport prior to the expiration of this 24  
13 hour period.

14 DATED this 23rd day of September, 2016.

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16   
17 UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF ELECTRONIC SERVICE**

The undersigned hereby certifies that he is an employee of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on September 22, 2016, he served an electronic copy of the above and foregoing **UNOPPOSED MOTION TO MODIFY CONDITIONS OF PRETRIAL RELEASE** by electronic service (ECF) to the person named below:

DANIEL G. BOGDEN  
United States Attorney  
NADIA J. AHMED  
Assistant United States Attorney  
333 Las Vegas Blvd. So. 5th Floor  
Las Vegas, NV 89101

/s/ Brandon Thomas  
Employee of the Federal Public Defender